

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Cecil and Marie Shamberger : CHAPTER 13
Debtor : NO. 19-11655amc

MOTION TO REINSTATE AUTOMATIC STAY

Debtors, Cecil and Marie Shamberger, by their counsel, Sharon S. Masters, Esq., hereby request the Court for an Order reinstating the automatic stay, and in support thereof aver as follows:

1. Debtors filed the instant case on 3/19/2019.
2. The Chapter 13 Plan was confirmed on 9/18/2019.
3. A Motion for Relief from Automatic Stay was filed by Nationstar on 10/18/2021 due to advances made for real estate taxes owed the City of Philadelphia. The creditor advanced \$2,676.53. Debtors and Nationstar entered into a Stipulation whereby Debtors would file a modified plan to include these advances made post-petition.
4. Debtor received a Notification of Default from Nationstar on 12/21/2022 for failure to pay \$660.00 for hazard insurance on the mortgaged property.
5. An Order granting relief from stay was entered on 4/17/2023.
6. Debtors and Nationstar, have agreed that the stay shall be reinstated upon payment of \$660.00 to Nationstar. The details of this Agreement shall be memorialized in a stipulated order.

WHEREFORE, Debtors respectfully request the Court enter an Order granting Motion to Reinstate Stay on the terms submitted by the parties in a stipulated Order.

Respectfully submitted,

/s/ Sharon S. Masters
Sharon S. Masters, Esq.
Counsel for Debtors

Dated: 7/18/2023